

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**SHEILA GREANEY**

**Plaintiff,**

**v.**

**DANIEL DRISCOLL, in his  
official capacity as Secretary of the United  
States Department of the Army,**

**Defendant.**

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**Civil No. 1:21-cv-3197-MJM**

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**MOTION FOR A STAY OF BRIEFING DEADLINES  
IN LIGHT OF THE LAPSE OF APPROPRIATIONS**

The United States of America hereby moves for a stay of the briefing deadlines in the above-captioned case related to the plaintiff's second motion to compel discovery and the defendant's response thereto.

1. At the end of the day on September 30, 2025, the appropriations act that had been funding the Department of Justice expired and appropriations to the Department lapsed. The same is true for several other Executive agencies, including the United States Attorney's Office for the District of Maryland and Executive Branch agencies that the United States Attorney's Office represents, including the defendant in this case. The Department does not know when funding will be restored by Congress.

2. Absent an appropriation, Department of Justice attorneys and employees of the defendant are prohibited from working, even on a voluntary basis, except in very limited circumstances, including "emergencies involving the safety of human life or the protection of property." 31 U.S.C. § 1342.

3. Undersigned counsel for the Department of Justice therefore requests a stay of the current deadlines for the parties to submit their respective memorandums regarding the plaintiff's motion to compel until Congress has restored appropriations to the Department.

4. If this motion for a stay is granted, undersigned counsel will notify the Court as soon as Congress has appropriated funds for the Department. The Government requests that, at that point, the parties will submit to the Court a proposed briefing schedule for its submissions that attempts to have such briefing filed in sufficient time so that the current November 13, 2025 hearing set by the Court in this case may still be preserved if the Court is so inclined.

5. Opposing counsel has authorized counsel for the Government to state that the plaintiff does not oppose this motion.

Therefore, although any disruption caused to the Court and the other litigants is greatly regretted, the Government hereby moves for a stay of the deadlines for the parties to submit respective memorandums related to the plaintiff's second motion to compel discovery until Department of Justice attorneys are permitted to resume their usual civil litigation functions.

A proposed Order is submitted herewith.

Respectfully submitted,

Kelly O. Hayes  
United States Attorney

By:

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*Counsel for the Defendant*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 2, 2025, the foregoing Motion for Stay of Briefing Deadlines Because of Lapse of Appropriations was filed with the Clerk of the Court using the CM/ECF system on plaintiff's counsel of record:

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*Attorney for Plaintiff*

/s/ Tarra DeShields  
Tarra DeShields  
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